

DECLARATION OF DEBBIE HALL DAVIS

My name is Debbie Hall Davis I am an adult resident of Dauphine County, Pennsylvania. I state the following.

1. Jon Hall is my brother. I am the second born child. Jon is the youngest.
2. My brother Jay and I stayed with our dad's parents until we were in junior high. It was a violent home at times. Grandfather (we always called him Chuck) on our dad's side regularly drank alcohol and physically and mentally abused our grandmother (Mama). For example, one night Chuck came home drunk, sliced up all of her clothes with a knife, and stuck the knife in a door frame. Another time they had an argument and I was knocked off a chair and broke my collarbone.
3. After my parents built the home in the country we lived with them. Joel was a baby when we moved to that house. Jon was born after we were living in this house.
4. Although Jon looked like my Dad, my Dad denied that Jon was his son. Dad favored Joel. He would take Joel to get ice cream and not take Jon. He did not bring any ice cream home for Jon either. He would pick up Joel and spin him around and then Jon would want a turn and Dad would just ignore him. Mom took up for Jon and favored him.
5. My parents had violent fights. As children, we used to take the knives and guns and put them under our mattress at night so Mom and Dad could not hurt each other. However, it got to the point where we would just say "if you are going to kill each other go ahead and do it when we are not around." We older ones would take the little ones and leave.
6. Dad regularly drank alcohol and physically and mentally abused Mom. Once, when Dad was beating on Mom, Jon, who was two or three years old, tried to stop Dad by hitting him with a fly swatter.
7. Dad worked mostly in Pittsburgh. He'd leave home before we got up and didn't get home until 6 p.m. or later. ^{but mostly later} Mom made us all wait until he came home to eat. This was a way for Mom to get at Dad by having the children upset with him because they were hungry.
8. Sometimes Mom would take us in the car and take us to the bar so we'd go in and say to Dad, "We are hungry, come home so we can eat."
9. Mom got a Thunderbird when she was selling Avon. During one fight between Mom and Dad, Dad threw a rock through the car's windshield as she was trying to leave. My brother Jay went down and threw a rock through Dad's windshield. I went down and started yelling at all of them because then I didn't have a car to drive. Our family was

always in turmoil.

10. When my mom's parents died they left Mom some money and stocks which included General Motors stock.
11. Because of all the fighting between our parents, we older ones left home as soon as we could. Kathy got married, Sheryl and I went to college. Jay went into the Army, Jeff to the Army, and Joel to the Air Force upon graduation. Jon went to trade school in Blairsville, PA.
12. When I was practice teaching my dad would drop me off at school on his way to work in Pittsburgh. We had good conversations and I got to know my dad better than I ever had before. He told me he felt the kids were Mom's responsibility while they were young and his responsibility was to bring home the money. Then later when the children were older he'd have a relationship with them. He said that he and mom would mellow in their "old age". He showed this in his discussions with me and with Kathy when she married. Kathy and Rick played bridge with Mom and Dad.
13. Also we would talk about which one of us would get yelled at more by Mom when we got home. Mom would get on a subject and never let it go. She would keep bringing up things for years.
14. However, Mom did have a reason to be angry with Dad. Dad would bring the car home and there would be two different sizes of muddy footprints on the head liner. Sometimes, on his job, he'd stay out of town for a period of time. When Dad got home, Mom found evidence of him buying other women gifts or of them buying him gifts, nice sweaters, cologne and such.
15. Mom and Dad had a love hate thing. Both of them knew what buttons to push to ~~aggravate the~~ other and get a fight started. Dad would beat her and then leave. One time he drove by in a convertible with another woman honking the horn so he would be seen. He also sent her a recording of the song Please Release Me Let Me Go. However, right away he was asking to come back and Mom let him come home.
16. We had some scary times at our house when someone was outside shooting at the house. I remember us all crawling around the house keeping low. This happened two or three times. I remember Mom being afraid and keeping us all down. I have sometimes wondered if it was Dad shooting or a crazy girlfriend. I was never aware of any bullets hitting the house, just hearing the shots and crawling on the floor.
17. One time Mom pulled a gun on Dad. She told him "run you son of a bitch - I'll give you to the count of ten." All of us children were around. Dad started running. My boy-friend helped take the gun away from her. This certainly scared all of us children.

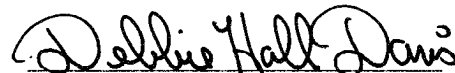
18. My Dad would not allow Mom to visit her sisters or go anywhere without taking some kids with her. She was not allowed to vote because her vote would cancel his.
19. When we were little we went to Mom's parents for Christmas and Dad's parents for Thanksgiving and these were happy times. By the time Jon was born, they fought about where they were going to go for holidays and so ended up not going anywhere.
20. Several times we were all going to go to the drive-in movies. We got blankets together and made popcorn and all of us waited in the car. Mom and Dad got to fighting. We children argued over who was going to go and ask them if we were still going to the drive-in but none of us wanted to ask them. Of course we didn't get to go, we unloaded the blankets and ate the popcorn.
21. There are some examples of mental instability in our family. One of my brothers has tried to commit suicide and was committed for manic depression. Aunt Mildred on Mom's side of the family committed suicide. My Great-grandfather broke radios because he said he heard moon doggies on the radio. I myself was diagnosed with depression in 2003-2004. However I am no longer on any medication, but at the time things became so overwhelming and I remembered feeling hopeless and unable to control anything. I also went through counseling which helped me put everything back in perspective.
22. My brothers really teased Jon. They would pull his pants down when cars went by and also put him up in trees where he would get stuck and cry to be let down.
23. Jon had a number of serious accidents growing up, including a car accident and a motorcycle accident.
24. The evening Dad died, when I came home there was an ambulance in the driveway. I assumed Dad had killed Mom or Mom had killed Dad.
25. Even though Jon was in the room with our dad when he was dying, Jon never talked about it. Later when I asked Jon about Dad he did not have a clear memory of him.
26. When Dad died, Kathy was married, I was in college, Jeff and Jay were in the military, only Sheryl, Joel and Jon were still living at home.
27. Mom married Ed Alexander three months after Dad died. Ed was a jerk. I believe he married mom thinking she would bank roll his business and I think Mom was totally scared of raising 7 children alone. He was very nice to her at first, took her out to dinner and treated her to things that she had not been able to experience having 7 kids and being married at the age of 15.
28. Mom and Ed did not live at the house my parents built but in a large house that Ed was a

caretaker for. It had been built for two separate families with common areas but the bedrooms were on opposite ends of the house. Mom and Ed's bedroom was on one side and Sheryl, Joel and Jon's on the other side. After graduation I moved out of our old house because I didn't want anything to do with Ed. Soon after that I got a teaching position in NC and I moved to Fayetteville, NC.

29. When Mom found out what type of man Ed was, that he had tried to molest Sheryl, and that he had multiple marriages that he had not told her about she started divorce proceedings. During the divorce proceedings he was trying to take mom's house and everything she had. Ed died before the divorce was final.
30. After Ed died Mom lived with Gene who was a close friend of dad's from high school. He lived in another town and Mom went off and left Joel and Jon living alone in the family home while they were teenagers and still in school.
31. After Dad died, Ed died, and I believe Gene had become paralyzed from a trucking accident, Mom was home again. She could not handle Jon, we made Jon come to Fayetteville and live with us. He was drinking and not paying any attention to what Mom said but was doing whatever he wanted to do. She had to work at night and he would go out and come home late. He had anger management issues, punched holes in the door, and mom was afraid he was going to hurt himself or others because of his temper. I believe this is one of the first times Jon would disconnect the phone so mom wouldn't call anyone.
32. When Jon came to Fayetteville he had to follow our very strict rules. No drinking, drugs, or girls overnight in our home. This was the first time that he had a strong male role model in his life. He was doing pretty good except for an incident where he was drinking and driving our car on the Base (Fort Bragg). He became lost and because of previous run ins with police and drinking, he took the keys out of the ignition and put them on the floor of the car and went to sleep. The MPs picked him up and called us. Jon was very upset with them and was cussing and acting crazy. We had to go get him and thanked the MP's for not shooting him because of his drunkenness and cussing. We would not allow Jon to drive our car after that and he had to get a bicycle to get around. He worked in our restaurant with us and then got a job working as a mechanic at a Chrysler dealership. He started going to church with us, was baptized and I can honestly say he was a very good housemate, was neat and followed our rules and was a hard worker. I think he just needed stability and a support system. He helped many people with their cars for little or no money. He was not drinking or doing drugs during this period. Then he met Billie.
33. All the girls in the family seem to be ambitious and successful and the boys seem different. I think this is because the girls all went to stay with our maternal grandparents during the summers. They lived on a farm and we learned to help. Also we learned about God. We were more nurtured than the boys.

34. The girls did well in school and were in all kinds of activities. The boys didn't like school and struggled. We did not have help with our homework.
35. After Jon learned how to fix cars, he would help people in the neighborhood. He would fix their cars and if they couldn't pay he'd say "Don't worry about it."
36. When we went to Jon's trial and testified we were very confused about what we were doing. Mr. Mayo called us at the motel around 11:00 p.m. the night before we were to testify. When I started to tell him of the things I had seen between Billie and Jon, I was told that it would not benefit Jon to talk badly about her or her family as the jury would not like it. The attorney told us only to talk about the bad times we had at home and the fights our parents had. The family has a video that we had made showing him taking the kids swimming and doing other activities with the children. This video would have shown the jury how much his daughters loved Jon and how much he loved them. If Jon's attorneys had interviewed us prior to the night before testimony we could have provided this video to him. No one ever suggested that we bring pictures showing the relationship between Jon and his children or told us what we could do to help Jon in anyway. We didn't know what to expect, we were looking for guidance from the attorneys. It seemed like it was already a done deal when we took the stand. After the trial we were in shock that he got the death penalty. Jon would not plea bargain because he didn't want his daughters to ever think he meant to hurt Billie. So he wanted a trial so he could prove this. I had information about Billie hitting Jon and kicking him in the groin area. Also there was an incident in Fayetteville where Jon and Billie had a fight and Jon disconnected the phone as usual.
37. All I know is that Jon loved Billie and his children even more. Jon was the main caretaker of his children. He learned how to do the therapy for Jessica, his child with cerebral palsy and did the majority of her treatments. Something snapped that terrible night and I'm sure that alcohol had something to do with it as he has never been able to handle it. All he ever wanted was a family of his own and I think he snapped when he saw everyone and everything he loved slipping away. Prior to Jon going to Billie's home that evening, Jon called home crying. Jon ^{was} been drinking and was suicidal. Mom and my sisters were trying to get Jon to come to Pennsylvania so the could help him get psychological help.. Alcohol has a terrible effect on his body and mind and always has. It is as though he becomes a different person.

I declare, under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.


Debbie Hall Davis

08/22/09
Date